

Plaintiffs' Exhibit 66

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES,) 1:23-cv-00108-LMB-JFA
et al.,)
)
Plaintiffs,)
)
vs.)
)
GOOGLE LLC,)
)
Defendant.)
_____)

VIDEOTAPED DEPOSITION OF
LARA STOTT
September 18, 2023
9:33 a.m.

Reported by: Bonnie L. Russo
Job No. 6097869

<p style="text-align: right;">Page 26</p> <p>1 Do you participate in any industry</p> <p>2 organizations or trade groups that relate to</p> <p>3 marketing and advertising?</p> <p>4 A. Not as much anymore. I used to be</p> <p>5 more involved with it, but frankly, I just</p> <p>6 don't have time now.</p> <p>7 Q. When were you involved with those</p> <p>8 groups?</p> <p>9 A. It's probably in here. Maybe not.</p> <p>10 Certainly early in my career, I was</p> <p>11 a member of some marketing associations, the</p> <p>12 IABC, the PR one that is escaping my mind right</p> <p>13 now. I was actually an officer in that one for</p> <p>14 a while.</p> <p>15 Those -- those were probably the two</p> <p>16 biggest between IABC and the one that I can't</p> <p>17 recall the name of right now.</p> <p>18 Q. This is probably going to happen a</p> <p>19 lot today with all of the acronyms, but IABC --</p> <p>20 do you know what IABC stands for?</p> <p>21 A. International Association of</p> <p>22 Business Communicators, I believe.</p>	<p style="text-align: right;">Page 28</p> <p>1 Do you use -- or do you use "air force</p> <p>2 recruiting service"?</p> <p>3 A. Air force recruiting service is how</p> <p>4 I refer to them, yes.</p> <p>5 Q. Okay. All right. All right.</p> <p>6 So what is your current position?</p> <p>7 A. I am the strategic marketing adviser</p> <p>8 for the commander, which basically means that I</p> <p>9 work for General Amrhein, but he has me down in</p> <p>10 the marketing division. And I work very</p> <p>11 closely with the chief of that division, Barry</p> <p>12 Dickey, as well as the rest of his team to</p> <p>13 primarily advise, but there -- there are</p> <p>14 special projects that I take on as well to --</p> <p>15 to assist in the various brand management or</p> <p>16 marketing tactics or strategies that we are</p> <p>17 building.</p> <p>18 I've helped build a regional</p> <p>19 marketing organization. That was one of the</p> <p>20 first special projects that I had. We are</p> <p>21 looking very closely right now at a lot of the</p> <p>22 social media we're doing across all of the</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Thank you.</p> <p>2 Have you ever served as a board</p> <p>3 member on any marketing or advertising</p> <p>4 organizations?</p> <p>5 A. I have, but again, it's probably</p> <p>6 been 20 years since that.</p> <p>7 Q. Do you recall what organizations or</p> <p>8 organization that those were?</p> <p>9 A. The -- the PR one that I cannot --</p> <p>10 PRSA. Yes, Public Relations Society of</p> <p>11 America. There it is.</p> <p>12 Q. Okay. So you served on the board of</p> <p>13 PRSA?</p> <p>14 A. PRSA in Austin, and that was</p> <p>15 probably early 2000, 2000 -- probably around</p> <p>16 the time of when I was at Edelman, so 2002,</p> <p>17 2003, somewhere in there.</p> <p>18 Q. All right. And now turning to your</p> <p>19 work at the air force --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- do you -- when you're talking</p> <p>22 about your employer, do you use "air force"?</p>	<p style="text-align: right;">Page 29</p> <p>1 components and the Space Force.</p> <p>2 And there is various other special</p> <p>3 projects that I get pulled into from time to</p> <p>4 time. I -- I work heavily in all of the annual</p> <p>5 planning.</p> <p>6 And then as far as with General</p> <p>7 Amrhein goes, I provide him with kind of my</p> <p>8 best counsel too. Particularly when there is</p> <p>9 new ideas or pitches that are coming into air</p> <p>10 force recruiting service, I will give him kind</p> <p>11 of a pulse on -- on, you know, what I believe</p> <p>12 about that or do some research for him if he</p> <p>13 asks me.</p> <p>14 It's -- it's pretty broad-ranging,</p> <p>15 but it's -- it's fun.</p> <p>16 Q. And does -- does Mr. Dickey report</p> <p>17 to you?</p> <p>18 A. No.</p> <p>19 Q. Okay. Do you have any direct</p> <p>20 reports?</p> <p>21 A. I do not.</p> <p>22 Q. And do you -- is your -- do you</p>

8 (Pages 26 - 29)

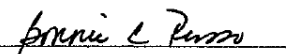
<p style="text-align: right;">Page 78</p> <p>1 MR. SOSNOWSKY: Objection. I'm</p> <p>2 sorry. Go ahead -- is there a follow-up</p> <p>3 question? Sorry.</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. Have you -- are you familiar with</p> <p>6 the term "open web display advertising"?</p> <p>7 A. I was not before I read the lawsuit.</p> <p>8 Q. Okay. So that is not a term you</p> <p>9 used in the regular course of your work in</p> <p>10 marketing over the last 30 years?</p> <p>11 A. No. I have never been a media</p> <p>12 buyer, so no, that's not something that I would</p> <p>13 have typically come across.</p> <p>14 Q. Okay. Is that -- do you consider --</p> <p>15 is that what you understand open web display</p> <p>16 advertising to mean, media buying?</p> <p>17 MR. SOSNOWSKY: Objection. Form.</p> <p>18 THE WITNESS: I understand it to be</p> <p>19 a form of media buying.</p> <p>20 BY MS. MILLIGAN:</p> <p>21 Q. What do you understand the term</p> <p>22 "walled garden" to mean?</p>	<p style="text-align: right;">Page 80</p> <p>1 platform, so in the instance of Meta, that</p> <p>2 would be Facebook or Instagram.</p> <p>3 Q. Okay. So the air force recruiting</p> <p>4 service -- strike that.</p> <p>5 Does the air force recruiting</p> <p>6 service work with GSD&M to purchase</p> <p>7 advertisements?</p> <p>8 A. GSD&M makes media recommendations</p> <p>9 and then after air force recruitment --</p> <p>10 recruiting service has reviewed those</p> <p>11 recommendations, we will either agree or</p> <p>12 disagree and then we will direct them to</p> <p>13 purchase the advertising on our behalf.</p> <p>14 Q. Are you involved in that process?</p> <p>15 A. Which part of the process do you</p> <p>16 mean?</p> <p>17 Q. The recommendation and review of</p> <p>18 recommendation process.</p> <p>19 A. I am part of the review process. I</p> <p>20 will typically sit in on media -- media</p> <p>21 briefings for the various components or the</p> <p>22 various campaigns, and then we discuss those</p>
<p style="text-align: right;">Page 79</p> <p>1 A. Do you mean based off of reading the</p> <p>2 lawsuit?</p> <p>3 Q. As I understand it, that's your only</p> <p>4 familiarity with the term "walled garden" --</p> <p>5 A. Yes.</p> <p>6 Q. -- is from reading the lawsuit.</p> <p>7 So yeah, but sitting here today,</p> <p>8 what do you understand it to mean?</p> <p>9 A. So as I recall from reading the</p> <p>10 lawsuit, walled garden was the paid social</p> <p>11 version of how an advertiser might purchase</p> <p>12 programmatic display. It's just on the paid</p> <p>13 social side instead of on the broader platform</p> <p>14 side, if you will.</p> <p>15 Q. What do you mean by "broader</p> <p>16 platform side"?</p> <p>17 A. Going back to the specific instance</p> <p>18 of say a DV360 which is programmatic display</p> <p>19 advertising, thousands and thousands of</p> <p>20 websites are available through that platform as</p> <p>21 opposed to a walled garden, which is going to</p> <p>22 be focused specifically on that paid social</p>	<p style="text-align: right;">Page 81</p> <p>1 internally at recruitment marketing and the COR</p> <p>2 on the media-buying program would then direct</p> <p>3 the agency based off of the internal</p> <p>4 discussions that we have had at RSM.</p> <p>5 Q. Who is the COR on the contract</p> <p>6 between air force recruiting service and GSD&M?</p> <p>7 A. Are you referring to the overall</p> <p>8 contract, or are you referring to a specific</p> <p>9 task order?</p> <p>10 Q. I am referring to the overall</p> <p>11 contract.</p> <p>12 A. The primary COR, my understanding is</p> <p>13 Lieutenant Colonel Tiffany Taylor and then</p> <p>14 Barry Dickey is the program manager.</p> <p>15 And you are aware what COR means,</p> <p>16 right, contracting officer representative.</p> <p>17 Okay.</p> <p>18 Q. Thank you. That is one that I am</p> <p>19 familiar with out of probably the 30 we're</p> <p>20 going to use today.</p> <p>21 Okay. Barry Dickey is the program</p> <p>22 manager. What does the program manager do?</p>

<p style="text-align: right;">Page 82</p> <p>1 MR. SOSNOWSKY: Objection.</p> <p>2 Foundation.</p> <p>3 THE WITNESS: Mr. Dickey has</p> <p>4 oversight of the entire advertising and</p> <p>5 marketing program.</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. Is his role, to the best of your</p> <p>8 knowledge, defined by the FAR?</p> <p>9 MR. SOSNOWSKY: Objection.</p> <p>10 Foundation.</p> <p>11 THE WITNESS: I have no idea.</p> <p>12 BY MS. MILLIGAN:</p> <p>13 Q. Okay. You understand that the role</p> <p>14 of the COR is defined by the FAR?</p> <p>15 MR. SOSNOWSKY: Objection. Form.</p> <p>16 Foundation.</p> <p>17 THE WITNESS: Do I understand that</p> <p>18 personally? No. But I am not a COR and I am</p> <p>19 not a contracting officer so that is really</p> <p>20 outside the realm of my need to know.</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. All right. And in your work with</p>	<p style="text-align: right;">Page 84</p> <p>1 BY MS. MILLIGAN:</p> <p>2 Q. What's the primary COR?</p> <p>3 A. Lieutenant Colonel Tiffany Taylor.</p> <p>4 Q. Okay. Are you familiar with someone</p> <p>5 named Jessica Santos?</p> <p>6 A. I am.</p> <p>7 Q. Okay. Do you work with Jessica</p> <p>8 Santos?</p> <p>9 A. I do.</p> <p>10 Q. Okay. Do you know Jessica Santos's</p> <p>11 job title?</p> <p>12 A. She is also a contracting officer.</p> <p>13 Q. Okay. Does she work on -- does she</p> <p>14 work on any of the GSD&M contracts?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Do you know which specific</p> <p>17 contract Jessica Santos works on?</p> <p>18 A. I believe that she has several. I</p> <p>19 know that she has public engagement task orders</p> <p>20 which are TO70 and TO74. I believe she also</p> <p>21 works on the creative development task order</p> <p>22 which is TO62 and there is probably others, but</p>
<p style="text-align: right;">Page 83</p> <p>1 Weber Shandwick, did you have the occasion to</p> <p>2 interact with the contracting officer for the</p> <p>3 contract with the army?</p> <p>4 MR. SOSNOWSKY: Objection. Form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. Okay. And what about the</p> <p>8 contracting officer representative for the</p> <p>9 army?</p> <p>10 MR. SOSNOWSKY: Objection. Form.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MS. MILLIGAN:</p> <p>13 Q. Okay. How do you know that the COR</p> <p>14 directs the ad agency?</p> <p>15 MR. SOSNOWSKY: Objection. Form.</p> <p>16 THE WITNESS: How do I know the COR</p> <p>17 directs the ad agency. That's the COR's job.</p> <p>18 The -- we have specific CORs designated for</p> <p>19 each individual task order and they are the</p> <p>20 only ones who can direct the agency, either</p> <p>21 that COR, the primary COR, Colonel Taylor or</p> <p>22 Mr. Dickey. That's it.</p>	<p style="text-align: right;">Page 85</p> <p>1 again, that is not really what I need to worry</p> <p>2 about on a day-to-day basis.</p> <p>3 Q. Why does air force recruiting</p> <p>4 service work with one agency?</p> <p>5 MR. SOSNOWSKY: Objection.</p> <p>6 Foundation. Form.</p> <p>7 THE WITNESS: That was a decision</p> <p>8 that was made before I joined air force</p> <p>9 recruiting service, but my understanding of</p> <p>10 that is, that the contract that air force</p> <p>11 recruiting has with GSD&M is a contract that --</p> <p>12 that requires that all recruitment marketing</p> <p>13 and advertising be executed through GSD&M.</p> <p>14 We have additional contracts with</p> <p>15 other providers as well, but they have very</p> <p>16 defined services.</p> <p>17 Q. All right. Ms. Stott, I am marking</p> <p>18 --</p> <p>19 MS. MILLIGAN: We can go off the</p> <p>20 record.</p> <p>21 THE VIDEOGRAPHER: The time is 11:28</p> <p>22 a.m. Off the record.</p>

<p style="text-align: right;">Page 122</p> <p>1 one to the side.</p> <p>2 (Deposition Exhibit 122 was marked</p> <p>3 for identification.)</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. All right. Ms. Stott, thank you for</p> <p>6 your patience while I first and second chair</p> <p>7 here.</p> <p>8 I am marking as Exhibit 122 a</p> <p>9 document Bates USAF-ADS-0000001422.</p> <p>10 All right. Ms. Stott, do you see at</p> <p>11 the first page here that this is an e-mail from</p> <p>12 Nora Rudyk with GSD&M to a number of people,</p> <p>13 including Barry Dickey and yourself?</p> <p>14 A. Yes.</p> <p>15 Q. All right. And this was sent on</p> <p>16 September 18, 2022. Do you see that?</p> <p>17 A. Yes, I do.</p> <p>18 Q. All right. And Ms. Rudyk -- Rudyk</p> <p>19 writes: "Alcon, GSD&M has updated the AFR</p> <p>20 media plan to end on 31 May 2023 along with the</p> <p>21 responses to the CRM. Please review and let us</p> <p>22 know if you have any additional questions.</p>	<p style="text-align: right;">Page 124</p> <p>1 comment resolution matrix.</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. All right. And then the second</p> <p>5 attachment is another deck from GSD&M, and this</p> <p>6 is Fiscal Year 22 task orders 34 and -- sorry.</p> <p>7 64 and 63 AFR media recommendation.</p> <p>8 Is this the Fiscal Year 22 air force</p> <p>9 reserve media recommendation?</p> <p>10 A. Yes, it is.</p> <p>11 Q. All right. And you provided</p> <p>12 feedback on this deck; is that correct?</p> <p>13 A. Yes, I did.</p> <p>14 Q. All right. So turning to Slide 2</p> <p>15 and just looking at the objective, can you</p> <p>16 describe what the objective of this media plan</p> <p>17 is in your own words.</p> <p>18 MR. SOSNOWSKY: Objection.</p> <p>19 Foundation.</p> <p>20 THE WITNESS: For air force reserve,</p> <p>21 they actually have two target audiences.</p> <p>22 BY MS. MILLIGAN:</p>
<p style="text-align: right;">Page 123</p> <p>1 GSD&M will be sending the AIR requests tomorrow</p> <p>2 for both TOs in order to have time to place the</p> <p>3 media so that search may start on 1 October.</p> <p>4 Thank you."</p> <p>5 Do you see that?</p> <p>6 A. Yes, I do.</p> <p>7 Q. Okay. What does Alcon mean?</p> <p>8 A. All concerned.</p> <p>9 Q. And what is the AIR requests?</p> <p>10 MR. SOSNOWSKY: Objection.</p> <p>11 Foundation.</p> <p>12 THE WITNESS: That is the</p> <p>13 advertising instruction record, and that is a</p> <p>14 request that GSD&M has to send to the COR any</p> <p>15 time they want to spend money to execute a</p> <p>16 tactic.</p> <p>17 BY MS. MILLIGAN:</p> <p>18 Q. Okay. And turning to the</p> <p>19 attachments, do you see here that there are two</p> <p>20 attachments, an Excel file and a PDF file?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. The first attachment is the</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. Okay.</p> <p>2 A. Their first target audience -- and</p> <p>3 it's really their primary audience -- is prior</p> <p>4 service because air force reserve's recruiting</p> <p>5 goal is to bring in 70 percent prior service,</p> <p>6 meaning someone who has already served in the</p> <p>7 air force or another military branch.</p> <p>8 And typically those prospects have</p> <p>9 already served out at least a four-year</p> <p>10 contract on prior service. Sometimes it's a</p> <p>11 two-year contract depending on the military</p> <p>12 branch. But that's why the age there is 21 to</p> <p>13 49.</p> <p>14 And then their second audience is</p> <p>15 nonprior service. That's the other 30 percent.</p> <p>16 And for reserve we focus on a slightly older</p> <p>17 target audience for the nonprior service</p> <p>18 audience so that we're not competing with the</p> <p>19 same target audience that we target from a</p> <p>20 total-force perspective. And then air force</p> <p>21 reserve also relies upon the advertising that</p> <p>22 we do for total force to help them meet their</p>

<p style="text-align: right;">Page 174</p> <p>1 THE WITNESS: That is one of many</p> <p>2 goals, but yes.</p> <p>3 BY MS. MILLIGAN:</p> <p>4 Q. Okay. Are there any other factors</p> <p>5 that come to mind?</p> <p>6 MR. SOSNOWSKY: Object to form.</p> <p>7 THE WITNESS: Any other factors as</p> <p>8 to how we choose which media channels --</p> <p>9 BY MS. MILLIGAN:</p> <p>10 Q. Yeah.</p> <p>11 A. -- to advertise on?</p> <p>12 Q. Yeah. I guess like does price?</p> <p>13 A. Sure. Again, when we have limited</p> <p>14 budgets, we're looking at ways first to kind of</p> <p>15 fill up that bottom part of the funnel to make</p> <p>16 sure we're achieving the most new contacts that</p> <p>17 we can. And engagements kind of play very</p> <p>18 heavily into that tube because the more we can</p> <p>19 get someone engaging with us on our -- on our</p> <p>20 website typically, the more likely they are to</p> <p>21 click on the apply now button and actually</p> <p>22 become a new contact.</p>	<p style="text-align: right;">Page 176</p> <p>1 channels to use for a specific advertising</p> <p>2 campaign, does privacy factor into that</p> <p>3 decisionmaking?</p> <p>4 MR. SOSNOWSKY: Objection to form.</p> <p>5 THE WITNESS: That's not really</p> <p>6 something that I would be looking at. That</p> <p>7 might be something that the COR might look at,</p> <p>8 or depending on -- on what the channel was</p> <p>9 going to be, there's, you know, other processes</p> <p>10 that we go through with the air force</p> <p>11 specifically with our chief information officer</p> <p>12 and others who might evaluate that if it was</p> <p>13 necessary.</p> <p>14 BY MS. MILLIGAN:</p> <p>15 Q. Okay. And how about historical ROI?</p> <p>16 MR. SOSNOWSKY: Object to form.</p> <p>17 THE WITNESS: Yes, we do look at</p> <p>18 historical results of like campaigns. I think</p> <p>19 you'll see in the media recommendations that</p> <p>20 they will often reference how things have</p> <p>21 performed historically. So, yes, that's</p> <p>22 absolutely something that we look at.</p>
<p style="text-align: right;">Page 175</p> <p>1 And once we have sufficiently funded</p> <p>2 those areas, then we will begin funding kind of</p> <p>3 the upper end of the funnel which is about</p> <p>4 building more awareness.</p> <p>5 Q. And so for your -- for your</p> <p>6 audience, I guess is it possible to I guess --</p> <p>7 strike that.</p> <p>8 For your -- is it possible for your</p> <p>9 audience to enter the funnel at the engaged</p> <p>10 level?</p> <p>11 MR. SOSNOWSKY: Objection to form.</p> <p>12 THE WITNESS: Sure. I -- I think</p> <p>13 that every prospect has kind of a unique</p> <p>14 journey through that prospect journey funnel.</p> <p>15 BY MS. MILLIGAN:</p> <p>16 Q. Okay. Is -- is privacy a factor</p> <p>17 that you consider?</p> <p>18 MR. SOSNOWSKY: Objection to form.</p> <p>19 THE WITNESS: In what way? What do</p> <p>20 you mean?</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. When you are evaluating which</p>	<p style="text-align: right;">Page 177</p> <p>1 BY MS. MILLIGAN:</p> <p>2 Q. And throughout the course of a</p> <p>3 campaign, does -- does the air force make</p> <p>4 changes to its initial strategy based on, say,</p> <p>5 interim ROI reports?</p> <p>6 MR. SOSNOWSKY: Objection to form.</p> <p>7 Foundation.</p> <p>8 THE WITNESS: We -- we will look at</p> <p>9 it on a monthly basis and then a quarterly</p> <p>10 basis. Sometimes the changes involve going</p> <p>11 from channel to channel. Sometimes it's</p> <p>12 slightly tweaking what the targeting is within</p> <p>13 a channel.</p> <p>14 It really just depends, again, on</p> <p>15 the channel that you're using and the objective</p> <p>16 that you're trying to meet with that channel,</p> <p>17 especially keeping in mind that channels can be</p> <p>18 used across the funnel for different purposes.</p> <p>19 BY MS. MILLIGAN:</p> <p>20 Q. Do you know in which channel does --</p> <p>21 for the -- strike that.</p> <p>22 For the EA campaign that we looked</p>

<p style="text-align: right;">Page 178</p> <p>1 at earlier, which channels are most important</p> <p>2 for air force in reaching your target audience?</p> <p>3 MR. SOSNOWSKY: Object to form.</p> <p>4 Foundation.</p> <p>5 THE WITNESS: Again, it depends on a</p> <p>6 lot of factors. It depends on what our budgets</p> <p>7 are that year in particular because, again,</p> <p>8 since we fund things from the lower end of the</p> <p>9 funnel, the recruit and engage section.</p> <p>10 But, generally speaking, again, we</p> <p>11 want to be on the platforms that the specific</p> <p>12 target audience -- so in this case for EA, it's</p> <p>13 more that 17- to 24-year-old with a STEM</p> <p>14 interest and, depending on the year, good</p> <p>15 grades, physically fit. It's different things.</p> <p>16 Kind of play with the aperture a little bit.</p> <p>17 BY MS. MILLIGAN:</p> <p>18 Q. Okay. So you're saying that you</p> <p>19 focus on identifying which platforms are going</p> <p>20 to have the greatest reach for your target</p> <p>21 audience?</p> <p>22 MR. SOSNOWSKY: Object to form.</p>	<p style="text-align: right;">Page 180</p> <p>1 I can't think of a specific example</p> <p>2 off the top of my head, but I know that there</p> <p>3 have been instances where we have gone either</p> <p>4 channel to channel or shifted targeting within</p> <p>5 a channel.</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. What do you mean by "shifted</p> <p>8 targeting" --</p> <p>9 MR. SOSNOWSKY: Object to form.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. -- "within a channel"?</p> <p>12 A. If we want to open the aperture, we</p> <p>13 might remove STEM focus so that you're instead</p> <p>14 going to 17- to 24-year-olds who are physically</p> <p>15 fit and make good grades.</p> <p>16 Q. Can you think of any other examples?</p> <p>17 MR. SOSNOWSKY: Objection to form.</p> <p>18 THE WITNESS: I mean, again, when we</p> <p>19 make changes, it's -- it's because we have</p> <p>20 noticed something is -- is off or wrong. So,</p> <p>21 no, not specifically.</p> <p>22 BY MS. MILLIGAN:</p>
<p style="text-align: right;">Page 179</p> <p>1 THE WITNESS: Not necessarily.</p> <p>2 Again, it depends on what part of the funnel we</p> <p>3 are working in. If we are working in the</p> <p>4 recruit part of the funnel, then that's more</p> <p>5 about generating new contracts, not about</p> <p>6 reach. Reach is really a -- inspire end of the</p> <p>7 funnel.</p> <p>8 BY MS. MILLIGAN:</p> <p>9 Q. Okay. I see.</p> <p>10 And so when you -- earlier you</p> <p>11 mentioned that sometimes the changes -- the</p> <p>12 changes that you might make for an advertising</p> <p>13 campaign involve going channel to channel.</p> <p>14 What do you mean by that?</p> <p>15 MR. SOSNOWSKY: Object to form.</p> <p>16 THE WITNESS: If a -- if a channel</p> <p>17 was underperforming, we might direct GSD&M to</p> <p>18 shift dollars. They may recommend that we</p> <p>19 shift dollars, and then we'll look at that</p> <p>20 internally and determine if we agree with that</p> <p>21 recommendation or not and then direct them one</p> <p>22 way or another.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. Okay. Do you know whether, in -- in</p> <p>2 the course of its work for air force, GSD&M</p> <p>3 works with any subcontractors to purchase</p> <p>4 media?</p> <p>5 MR. SOSNOWSKY: Objection to form.</p> <p>6 Foundation.</p> <p>7 THE WITNESS: Again, I think that</p> <p>8 would be a better question for the contracting</p> <p>9 officer or for the COR. I'm not really sure.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. And so you've discussed platforms</p> <p>12 and channels. Are you -- I guess what's the</p> <p>13 difference between those two terms in the way</p> <p>14 that you use them?</p> <p>15 MR. SOSNOWSKY: Object to form.</p> <p>16 THE WITNESS: The way I use them,</p> <p>17 the channel is the type of media, like paid</p> <p>18 social or programmatic display or online video.</p> <p>19 The platform are the various</p> <p>20 platforms where you can purchase that type of</p> <p>21 advertising. So in the instance of paid</p> <p>22 social, that would be a Facebook or an</p>

<p style="text-align: right;">Page 266</p> <p>1 THE VIDEOGRAPHER: The time is 4:42</p> <p>2 p.m. We are off the record.</p> <p>3 (Whereupon, the proceeding was</p> <p>4 concluded at 4:42 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 268</p> <p>1 Mark Sosnowsky, Esq.</p> <p>2 mark.sosnowsky@usdoj.gov</p> <p>3 September 19, 2023</p> <p>4 RE: United States, Et Al v. Google, LLC</p> <p>5 9/18/2023, Lara Stott (#6097869)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 erratas-cs@veritext.com</p> <p>16</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 267</p> <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, Bonnie L. Russo, the officer before</p> <p>3 whom the foregoing deposition was taken, do</p> <p>4 hereby certify that the witness whose testimony</p> <p>5 appears in the foregoing deposition was duly</p> <p>6 sworn by me; that the testimony of said witness</p> <p>7 was taken by me in shorthand and thereafter</p> <p>8 reduced to computerized transcription under my</p> <p>9 direction; that said deposition is a true</p> <p>10 record of the testimony given by said witness;</p> <p>11 that I am neither counsel for, related to, nor</p> <p>12 employed by any of the parties to the action in</p> <p>13 which this deposition was taken; and further,</p> <p>14 that I am not a relative or employee of any</p> <p>15 attorney or counsel employed by the parties</p> <p>16 hereto, nor financially or otherwise interested</p> <p>17 in the outcome of the action.</p> <p>18</p> <p>19 </p> <p>20 Notary Public in and for</p> <p>21 the District of Columbia</p> <p>22 My Commission expires: August 14, 2025.</p>	<p style="text-align: right;">Page 269</p> <p>1 United States, Et Al v. Google, LLC</p> <p>2 Lara Stott (#6097869)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 PAGE____ LINE____ CHANGE_____</p> <p>20 _____</p> <p>21 REASON_____</p> <p>22 _____</p> <p>23 _____</p> <p>24 Lara Stott Date _____</p> <p>25</p>

Page 270

1 United States, Et Al v. Google, LLC

2 Lara Stott (#6097869)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Lara Stott, do hereby declare that I

5 have read the foregoing transcript, I have made any

6 corrections, additions, or changes I deemed necessary as

7 noted above to be appended hereto, and that the same is

8 a true, correct and complete transcript of the testimony

9 given by me.

10

11 _____

12 Lara Stott Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16

17

18

19 _____

20

21

22

23

24

25

NOTARY PUBLIC

69 (Page 270)

1 United States, Et Al v. Google, LLC

2 Lara Stott (#6097869)

3 E R R A T A S H E E T

4 PAGE 147 LINE 12 CHANGE that to what

5
6 REASON transcription error

7 PAGE 174 LINE 18 CHANGE tube to too

8
9 REASON transcription error

10 PAGE 187 LINE 10, 16 CHANGE engaged to
11 engagement

12 REASON transcription error

13 PAGE 194 LINE 8-9 CHANGE ROTC academy to
14 ROTC and Academy

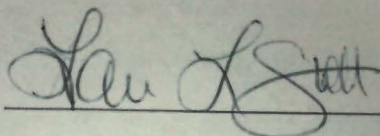
15 REASON transcription error

16 PAGE 247 LINE 10-11 CHANGE Schriber, S-G-H-R-I-B-E-R
17 to Schrider, S-G-H-R-I-D-E-R

18 REASON misstatement

19 PAGE _____ LINE _____ CHANGE _____

20
21 REASON _____

22
23 

24 Lara Stott

25 30 Oct 2023

Date

1 United States, Et Al v. Google, LLC

2 Lara Stott (#6097869)

3 E R R A T A S H E E T


4 PAGE 36 LINE 7 CHANGE plat to platform

5
6 REASON transcription error

7 PAGE 64 LINE 15 CHANGE Robby to Robbi

8 *See also p. 67, line 9 and p. 156, line 20

9 REASON transcription error / misspelling

10 PAGE 122 LINE 12 CHANGE Nora to  Norah

11 *See also p. 154, line 1a and p. 217, line 10

12 REASON transcription error / misspelling

13 PAGE 131 LINE 9 CHANGE intra-segments to

14 interest segments

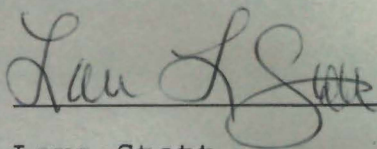
15 REASON transcription error

16 PAGE 136 LINE 1 CHANGE NCPÉ to and CPE

17
18 REASON transcription error

19 PAGE 139 LINE 14 CHANGE nonprior to prior

20
21 REASON transcription error

22
23 

24 Lara Stott

25 30 Oct 2023

Date

1 United States, Et Al v. Google, LLC

2 Lara Stott (#6097869)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Lara Stott, do hereby declare that I.
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10 Lara L Stott

11 30 Oct 2023

12 Lara Stott

Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
20
21
22
23
24
25